



**BOULT • CUMMINGS**  
**CONNERS • BERRY PLC**

RECEIVED

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January 23, 2003

TN REGULATORY AUTHORITY  
DOCKET ROOM

Ron Jones, Director  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37201

Re: "Petition of Tennessee UNE-P Coalition to Open Contested Case  
Proceeding to Declare Unbundled Switching on Unrestricted Unbundled  
Network Element" Docket 02-00207

Dear Director Jones:

The Tennessee UNE-P Coalition submits the following in response to your Order of January 10, 2003, requesting comments from the parties.

a. Several of the carriers listed as not responding to the Staff's data request are members of the UNE-P Coalition. Because of the similarities between the Staff's data request and the discovery questions filed by BellSouth (to which all members of the Coalition responded), there was initially some confusion on the part of some Coalition members as to whether it was necessary to file a separate response to the Staff's request. Counsel for the Coalition has brought to the attention of the Coalition members that the Staff request included some questions which were not included in BellSouth's discovery requests. That information will be submitted to the agency.


b. Most of the other CLECs on the list appear to be inactive in Tennessee. The Staff may readily confirm this through telephone contacts.

c. Of the four remaining carriers which are active in Tennessee but are not members of the Coalition and have not responded to the Data Request (Quest, Momentum, Xspedius, and Nu Vox), the Coalition suggests that the Data Requests be sent again in the form of a subpoena, pursuant to T.C.A. § 65-3-110.

Ron Jones, Director  
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Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:   
Henry Walker

HW/kma

cc: All parties

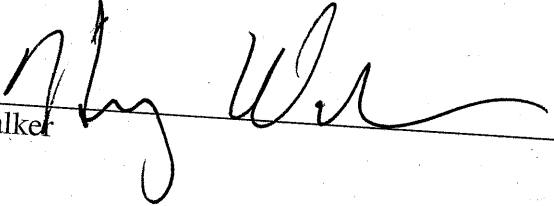
## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 23rd day of January, 2003.

Guy Hicks, Esq.  
BellSouth Telecommunications, Inc.  
333 Commerce Street, Suite 2101  
Nashville, TN 37201-3300

Charles B. Welch, Esq.  
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